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October 29, 2002

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**ATTENTION:** Document Control Desk

**SUBJECT:** Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Request for Relief from ASME Code Requirements to Authorize Use of  
Mechanical Seal Assemblies at Calvert Cliffs Nuclear Power Plant as an  
Alternate Repair Method

**REFERENCES:**

- (a) Letter from Mr. C. H. Cruse (CCNPP) to NRC Document Control Desk, dated February 27, 2001, Request for Relief from ASME Code Requirements to Authorize Use of Mechanical Seal Assemblies at Calvert Cliffs Nuclear Power Plant as an Alternate Repair Method
- (b) Letter from Mr. R. J. Laufer (NRC) to Mr. C. H. Cruse (CCNPP) dated August 7, 2002, Request for Relief for Temporary Installation of Mechanical Nozzle Seal Assemblies at the Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2 (TAC Nos. MB0557 and MB0558)

The use of mechanical seal assemblies was approved for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs) in Reference (b). On review of Reference (b), we noted several references to an edition of the American Society of Mechanical Engineers (ASME) Code that is not our code of record (Section XI, 1998 Edition, no Addenda). This letter is to clarify how the Code applies to Calvert Cliffs related to the mechanical nozzles.

1. On Page 4 of the Safety Evaluation attached to Reference (b), Section 2.2.1, the last sentence of the second full paragraph - Table IWB-2500-1, Examination Category B-E; "Pressure Retaining Partial Penetration Welds in Vessels," is not contained in the 1998 Edition and therefore will not be applied to the mechanical nozzles.
2. On Page 7 of the Safety Evaluation attached to Reference (b), Section 3.3, the first sentence of Paragraph a - B-E (Item B4.13) does not exist in the 1998 Edition and therefore will not be applied to the mechanical nozzles.

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Both our Code of record and the editions referenced in the Nuclear Regulatory Commission letter have the same inspection requirements. Vessel VT-2 examinations are required for these penetrations under Examination Category B-P Item Number 15.20 in the 1998 Edition of Section XI. Therefore, we consider that no further action is required.

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter E. Kefauver". The signature is fluid and cursive, with the first name "Peter" being the most prominent.

PEK/EMT/bjd

cc: J. Petro, Esquire  
J. E. Silberg, Esquire  
Director, Project Directorate I-1, NRC  
D. M. Skay, NRC

H. J. Miller, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR